

O'TOOLE SCRIVO

ATTORNEYS AT LAW

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April 12, 2022

VIA CM/ECF

Hon. Andrè Espinosa
United States Magistrate Judge
Martin Luther King Jr. Courthouse
50 Walnut Street, Room 2037 Court Room 2D
Newark, New Jersey 07102
(973) 645-3827

Re: Matter: Paul Goroff v. Thieman Tailgates, Inc. et al.
Docket No.: 2:21-cv-09668-KM-AME
Venue: United States District Court, New Jersey District Court

Dear Judge Espinosa,

Our office represents the Defendant, Thieman Tailgates, Inc. ("Thieman"), in the above referenced action. We are writing to inform the Court that the Parties have resolved the disputed discovery issues raised in the previous joint letter dated April 8, 2022, Document 71, as follows and requests this Court's approval of the following proposed joint resolution:

1. Thieman has confirmed its intention to mediate the case prior to completion of physical examinations, subject to co-defendants also agreeing to participate in mediation and with the understanding that no participating party will take a no pay position. As such, Plaintiff agrees to extend the due date for service of the Defendants' medical expert and economist reports from May 26, 2022 to July 26, 2022;
2. Plaintiff also agrees to supplement its medical expert disclosures for the treating doctors, Dr. Ellen Gallat and Dr. James A. Cavallo, to include the specific diagnosis they are expected to testify about and, to the extent possible, a summary of their expected opinions regarding prognosis and permanence of said diagnosis.

The Parties respectfully request this Court permit the above agreed upon extension of the due date for Defendants' medical experts.

S: Larry C. Green

Larry C. Green